

REMARKS

This is in response to the Office Action mailed November 18, 2003. Reconsideration and allowance of the subject application, as amended, are respectfully requested.

The Specification has been amended to correct informalities, as requested by the Examiner at page 2 of the Office Action. The Claims have been amended to clarify the claimed subject matter. No new matter is believed to have been added to the subject application as a result of the changes made thereto.

In the Office Action, the Examiner has rejected claims 1-32 and 39-43 under 35 USC § 102(b), and claims 33-38 under 35 USC § 103(a), as being anticipated or rendered obvious, respectively, by Ofek (U.S. Patent No. 5,901,327). It is respectfully submitted that the claims, as amended, are neither anticipated nor rendered obvious by Ofek.

As the Examiner is well aware, in order for Ofek to anticipate Applicant's claims, each and every element of the claims must be identically and exactly disclosed within the four corners of Ofek. Additionally, in order to establish a *prima facie* case of obviousness:

First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. . . The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure [emphasis added]. *In re Vaech*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). *Manual of Patent Examining Procedure* (MPEP), 8th Edition, August 2001, § 2143.

In Ofek's disclosed arrangement, two data storage systems are interconnected by a data link. In contrast to Ofek's disclosed arrangement, claim 1 recites:

A first adapter to use in a first server in a network, the first adapter comprising:

a host bus adapter (HBA) including circuitry to cause, in response to a first request received by the HBA, execution of a first data storage-related operation associated with a first set of mass storage devices and to issue, also in response to the first request, a second request from the HBA to a second adapter in a second server in the network to cause the second adapter to perform, in response to the second request, a second data storage-related operation associated with a second set of mass storage devices. (Claim 1, as amended).

This combination of limitations recited in claim 1, as amended, is nowhere disclosed or suggested in Ofek. The other currently pending independent claims recite, at least in part, at least some of these limitations of claim 1, as amended, and/or limitations that are similar to at least some of the limitations of claim 1, as amended, that patentably distinguish claim 1, as amended, over Ofek. These specific combinations of limitations of the independent claims, as amended, permit the inventions of these independent claims, as amended, to achieve advantages that are not achieved by Ofek's disclosed arrangement. For example, although these independent claims are not limited to the specific embodiments disclosed in the Specification, the Specification at page 23, lines 1 to 13 describes at least some of these advantages in the context of one of these embodiments. (See, e.g., Specification, page 23, lines 1 to 13).

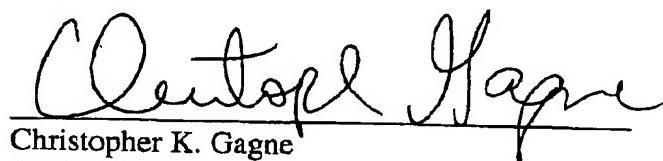
Thus, in view of the specific, advantageous combinations of limitations of the independent claims, as amended, that are not disclosed or suggested in Ofek, it is respectfully submitted that Ofek does not anticipate or render obvious the claims, as amended, of the subject application. Thus, it is respectfully submitted that the Examiner's rejections of claims 1-32 and 39-43, as amended, under 35 USC § 102(b), and of claims 33-38, as amended, under 35 USC § 103(a), as being anticipated or rendered obvious, respectively, by Ofek have been overcome.

In the event that the Examiner deems personal contact desirable in further disposition of this case, the Examiner is invited to call the undersigned attorney at 508-865-4168.

Please charge any shortages and credit any overcharges to Deposit Account number 02-2666.

Respectfully submitted,

Date: 27 JAN 04



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